

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

<b>UNITED STATES OF AMERICA,</b>	)	
	)	
<b>Petitioner,</b>	)	
	)	
<b>V.</b>	)	<b>CIVIL ACTION NO. SA-20-CV-938</b>
	)	
<b>REAL PROPERTY LOCATED AT</b>	)	
<b>43 SABLE VALLEY, SAN ANTONIO,</b>	)	
<b>BEXAR COUNTY, TEXAS 78258,</b>	)	
	)	
<b>Respondent.</b>	)	

**VERIFIED COMPLAINT FOR FORFEITURE**

Comes now Petitioner United States of America, by and through the United States Attorney for the Western District of Texas and the undersigned Assistant United States Attorney, pursuant to Rule G, Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, Federal Rules Civil Procedure, and respectfully states as follows:

**I.  
NATURE OF THIS ACTION**

This action is brought by the United States of America seeking forfeiture to the United States of the following property:

**REAL PROPERTY LOCATED AT 43 SABLE VALLEY, SAN ANTONIO, BEXAR COUNTY, TEXAS 78258** with all buildings, appurtenances, and improvements, thereon and any and all surface and sub-surface rights and interests, if any, and being more fully described as:

**LOT 38, BLOCK 22, NEW CITY BLOCK 19217, MESA GRANDE SUBDIVISION UNIT 4, PLANNED UNIT DEVELOPMENT, CITY OF SAN ANTONIO, BEXAR COUNTY, TEXAS, ACCORDING TO THE PLAT RECORDED IN VOLUME 9562, PAGE(S) 134-136, DEED AND PLAT RECORDS, BEXAR COUNTY, TEXAS;**

also known as hereinafter referred to as "Respondent Real Property."

## **II.**

### **JURISDICTION AND VENUE**

Under Title 28 U.S.C. § 1345, this Court has jurisdiction over an action commenced by the United States, and under Title 28 U.S.C. § 1355(a), jurisdiction over an action for forfeiture. This Court has *in rem* jurisdiction over the Respondent Real Property under Title 28 U.S.C. §§ 1355(b)(6) and 1395. Venue is proper in this district pursuant to Title 28 U.S.C. § 1355(b)(1)(A) because the acts or omissions giving rise to the forfeiture occurred in this district, and pursuant to Title 28 U.S.C. §§ 1355(b)(1)(B) and 1395(b) because the Respondent Real Property is found in this district.

## **III.**

### **VIOLATIONS**

This is a civil forfeiture action *in rem* brought against the Respondent Real Property for violations of Title 18 U.S.C. § 1343, and subject to forfeiture to the United States of America pursuant to Title 18 U.S.C. § 981(a)(1)(C), which states:

**Title 18 U.S.C. § 981.**

(a)(1) The following property is subject to forfeiture to the United States:

\* \* \*

(C) Any property, real or personal, which constitutes or is derived from proceeds traceable to . . . any offense constituting "specified unlawful activity" (as defined in section 1956(c)(7) of this title), or a conspiracy to commit such offense.

Wire Fraud is an offense constituting "specified unlawful activity" as defined in section 1956(c)(7) of this title.

## **IV.**

### **FACTS IN SUPPORT OF VIOLATIONS**

See Appendix "A" for facts under seal.

V.  
**PRAYER**

WHEREFORE, Petitioner, United States of America, prays that due process issue to enforce the forfeiture of the Respondent Real Property, that due notice pursuant to Rule G(4) be given to all interested parties to appear and show cause why forfeiture should not be decreed,<sup>1</sup> and in accordance with Rule G of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, Fed. R. Civ. P., that the Respondent Real Property be forfeited to the United States of America, that the Respondent Real Property be disposed of in accordance with the law and for any such further relief as this Honorable Court deems just and proper.

Respectfully submitted,

JOHN F. BASH  
United States Attorney

By:



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Attorneys for the United States of America

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<sup>1</sup> Appendix B, which is being filed along with this complaint, will be sent to those known to the United States to have an interest in the Respondent Property.

**VERIFICATION**


Special Agent David F. Rivera, declares and says that:

1. I am a Special Agent with the Federal Bureau of Investigation, assigned to the San Antonio District Office, and am the investigator responsible for the accuracy of the information provided in this litigation; and

2. I have read the above Verified Complaint for Forfeiture and know the contents thereof; that the information contained in the Verified Complaint for Forfeiture has been furnished by official government sources; and based on information and belief, the allegations contained in the Verified Complaint for Forfeiture are true.

Pursuant to Title 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on this the 11 day of August, 2020.

  
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David F. Rivera, Special Agent  
Federal Bureau of Investigation